

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
2 A Limited Liability Partnership
3 Including Professional Corporations
4 TRACEY A. KENNEDY, Cal Bar No. 150782
5 ROBERT E. MUSSIG, Cal. Bar No. 240369
6 H. SARAH FAN, Cal. Bar No. 328282
7 350 South Grand Avenue, 40th Floor
Los Angeles, CA 90071-3460
Telephone: 213.620.1780
Facsimile: 213.620.1398
E-mail: tkennedy@sheppardmullin.com
rmussig@sheppardmullin.com
sfan@sheppardmullin.com

8 Attorneys for Defendant.
9 CHEVRON U.S.A. INC.,
a Pennsylvania corporation

10

11 UNITED STATES DISTRICT COURT

12 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

13 MARK SNOOKAL, an individual,

14 Plaintiff,

15 vs.

16 CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
inclusive,

17 Defendants.

18 Case No. 2:23-cv-6302-HDV-AJR

19 **DECLARATION OF ROBERT E.**
MUSSIG IN SUPPORT OF
DEFENDANT CHEVRON U.S.A.,
INC.’S MOTION IN LIMINE NO. 1 TO
EXCLUDE EVIDENCE OR
TESTIMONY OF ANY SUBJECTIVE
OPINION OR BELIEF BY PLAINTIFF
REGARDING HIS PAST OR FUTURE
ECONOMIC DAMAGES

20 Date: July 29, 2025

21 Time: 10:00 a.m.

22 Place: Courtroom 5B – Fifth Floor

23 District Judge: Hon. Hernán De. Vera
Magistrate Judge: Hon. A. Joel Richlin

24 Action Filed: August 3, 2023

Trial Date: August 19, 2025

DECLARATION OF ROBERT MUSSIG

I, Robert Mussig, declare as follows:

1. I am an attorney licensed to practice law in California. I am a partner with the law firm Sheppard, Mullin, Richter & Hampton LLP, counsel of record for Defendant Chevron USA, Inc. I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. I took the deposition of Plaintiff Mark Snookal on May 10, 2024, and I am in possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit A** is a true and correct copy of relevant excerpts from Plaintiff's deposition transcript.

3. My office took the deposition of Plaintiff's economics expert, Dr. Charles L. Baum on February 10, 2025, and I am in possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit B** is a true and correct copy of relevant excerpts from Dr. Baum's deposition transcript.

4. Attached hereto as **Exhibit C** is a true and correct copy of Dr. Baum's Expert Report which was authenticated at his deposition as Exhibit 1.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this Declaration was executed on July 1, 2025, at Los Angeles, California.

/s/ Robert Mussig

ROBERT MUSSIG